

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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| In re: |) | Chapter 11 |
| |) | Case No. 01-1139 (JKF) |
| W.R. GRACE & CO., <i>et al.</i> , |) | Jointly Administered |
| |) | |
| Debtors. |) | RE: 26429, 26432, 26439, 26441, 26444 |

**SUMMARY RESPONSE OF MARYLAND CASUALTY COMPANY TO
OBJECTIONS FILED PURSUANT TO RULE 9033
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Maryland Casualty Company (“MCC”), by and through its undersigned counsel, pursuant to Rule 9033(b) of the Federal Rules of Bankruptcy Procedure, and the *Order* of the United States District Court of the District of Delaware dated February 23, 2011, Case No. 1:11-MC-00042-RLB [Docket No. 4] (“Order”), hereby responds to certain objections filed pursuant to Rule 9033 of the Federal Rules of Bankruptcy Procedure (collectively the “Objections”)¹ as follows:

¹ *Objections Of BNSF Railway Company In Accordance With Bankruptcy Rule 9033 To The Memorandum Opinion Regarding Objections To Confirmation Of First Amended Joint Plan Of Reorganization And Recommended Supplemental Findings Of Fact And Conclusions Of Law And The Recommended Findings Of Fact, Conclusions Of Law And Order Regarding Confirmation Of First Amended Joint Plan Of Reorganization As Modified Through December 23, 2010 And Order Clarifying Memorandum Opinion And Order Confirming Joint Plan As Amended Through December 23, 2010 [Docket No. 26429]; Preliminary Objection By Her Majesty The Queen In Right Of Canada, Pursuant To Rule 9033 Of The Federal Rules Of Bankruptcy Procedure, To (I) The Memorandum Opinion Regarding Objections To Confirmation Of First Amended Joint Plan Of Reorganization And Recommended Supplemental Findings Of Fact And Conclusions Of Law, (II) The Recommended Findings Of Fact, Conclusions Of Law And Order Regarding Confirmation Of First Amended Joint Plan Of Reorganization As Modified Through December 23, 2010, And (III) The Order Clarifying Memorandum Opinion And Order Confirming Joint Plan As Amended Through December 23, 2010 [Docket No. 26432]; Preliminary Objection By Garlock Sealing Technologies LLC, Pursuant To Rule 9033 Of The Federal Rules Of Bankruptcy Procedure, To (I) The Memorandum Opinion Regarding Objections To Confirmation Of First Amended Joint Plan Of Reorganization And Recommended Supplemental Findings Of Fact And Conclusions Of Law, (II) Recommended Findings Of Fact, Conclusions Of Law And Order Regarding Confirmation Of First Amended Joint Plan Of Reorganization As Modified Through December 23, 2010, And (III) The Order Clarifying Memorandum Opinion And Order Confirming Joint Plan As Amended Through December 23, 2010 [Docket No. 26439]; Libby Claimants’ Objection To Recommended Findings Of Fact, Conclusions Of Law And Order Regarding Confirmation Of First Amended Joint Plan Of Reorganization [Docket No. 26441]; and Preliminary Objection by The State of Montana, Pursuant to Rule 9033 Of The Federal Rules Of Bankruptcy Procedure, To (I) The Memorandum Opinion Regarding Objections To Confirmation Of First Amended Joint Plan Of Reorganization And Recommended Supplemental Findings Of Fact And Conclusions Of Law, (II) Recommended Findings Of Fact, Conclusions Of Law And Order Regarding Confirmation Of First Amended Joint Plan Of Reorganization As Modified Through December 23, 2010, And (III)*

MCC: (i) opposes the Objections to the extent that they seek any relief inconsistent with MCC's position as set forth in *Maryland Casualty Company's Objection To First Amended Joint Plan Of Reorganization Under Chapter 11 Of The Bankruptcy Code Of W.R. Grace & Co., et al., The Official Committee Of Asbestos Personal Injury Claimants, The Asbestos PI Future Claimants' Representative, And The Official Committee Of Equity Security Holders Dated As Of February 27, 2009* [Docket No. 21783], *Maryland Casualty Company's Brief In Support Of Its Phase II Objections To First Amended Joint Plan Of Reorganization Under Chapter 11 Of The Bankruptcy Code Of W.R. Grace & Co., et al., The Official Committee Of Asbestos Personal Injury Claimants, The Asbestos PI Future Claimants' Representative, And The Official Committee Of Equity Security Holders Dated As Of February 27, 2009* [Docket No. 22426], *Maryland Casualty Company's Opening Post-Trial Brief In Support Of Its Phase II Objections To First Amended Joint Plan Of Reorganization Under Chapter 11 Of The Bankruptcy Code Of W.R. Grace & Co., et al., The Official Committee Of Asbestos Personal Injury Claimants, The Asbestos PI Future Claimants' Representative, And The Official Committee Of Equity Security Holders Dated As Of February 27, 2009* [Docket No. 23645], *Maryland Casualty Company's Post-Trial Reply Brief In Support Of Its Positions Relating To First Amended Joint Plan Of Reorganization Under Chapter 11 Of The Bankruptcy Code Of W.R. Grace & Co., et al., The Official Committee Of Asbestos Personal Injury Claimants, The Asbestos PI Future Claimants' Representative, And The Official Committee Of Equity Security Holders Dated As Of February 27, 2009* [Docket No. 23816], and the arguments of MCC's counsel relating thereto; and (ii) reserves all of its rights to fully respond to the Objections in the "appellate briefs" as provided in the Order.

The Order Clarifying Memorandum Opinion And Order Confirming Joint Plan As Amended Through December 23, 2010 [Docket No. 26444]

Dated: March 14, 2011

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/s/ Jeffrey C. Wisler

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